

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

LA UNION DEL PUEBLO ENTERO et al.,)	
)	
<i>Plaintiffs,</i>)	
)	
v.)	Case No. 1:21-cv-00786-LY,
)	Consolidated with 5:21-cv-00844-XR
GREGORY W. ABBOTT et al.,)	
)	
<i>Defendants.</i>)	

**DEFENDANT BEXAR COUNTY ELECTION ADMINISTRATOR
JACQUELYN CALLANEN’S ANSWER TO PLAINTIFFS’
SECOND AMENDED COMPLAINT (DOCKET NO. 207)**

Now comes Defendant Bexar County Elections Administrator Jacquelyn Callanen, and files this Answer to Plaintiffs’ Second Amended Complaint for Declaratory and Injunctive Relief.

GENERAL DENIAL

Pursuant to Federal Rule of Civil Procedure 8(b), Defendant Callanen denies each and every allegation contained in Plaintiff’s Complaint except those expressly admitted herein. The following specific admissions and denials are made to the corresponding paragraphs of Plaintiffs’ Complaint (docket no. 207 in Consolidated Case No. 5:21-cv-00844-XR).

RESPONSES TO ALLEGATIONS IN PLAINTIFF’S COMPLAINT

NATURE OF CASE

1. Plaintiff’s allegations in Paragraph 1 are not directed toward Defendant Callanen, but in an abundance of caution, Defendant Callanen denies any allegations that could pertain to her.
2. Plaintiff’s allegations in Paragraph 2 are not directed toward Defendant Callanen, but in an abundance of caution, Defendant Callanen denies any allegations that could pertain to her.

3. Plaintiff's allegations in Paragraph 3 are not directed toward Defendant Callanen, but in an abundance of caution, Defendant Callanen denies any allegations that could pertain to her.
4. Plaintiff's allegations in Paragraph 4 are not directed toward Defendant Callanen, but in an abundance of caution, Defendant Callanen denies any allegations that could pertain to her.
5. Plaintiff's allegations in Paragraph 5 are not directed toward Defendant Callanen, but in an abundance of caution, Defendant Callanen denies any allegations that could pertain to her.
6. Plaintiff's allegations in Paragraph 6 are not directed toward Defendant Callanen, but in an abundance of caution, Defendant Callanen denies any allegations that could pertain to her.
7. Plaintiff's allegations in Paragraph 7 are not directed toward Defendant Callanen, but in an abundance of caution, Defendant Callanen denies any allegations that could pertain to her.
8. Plaintiff's allegations in Paragraph 8 are not directed toward Defendant Callanen, but in an abundance of caution, Defendant Callanen denies any allegations that could pertain to her.
9. Plaintiff's allegations in Paragraph 9 are not directed toward Defendant Callanen, but in an abundance of caution, Defendant Callanen denies any allegations that could pertain to her.
10. Plaintiff's allegations in Paragraph 10 are not directed toward Defendant Callanen, but in an abundance of caution, Defendant Callanen denies any allegations that could pertain to her.
11. Plaintiff's allegations in Paragraph 11 are not directed toward Defendant Callanen, but in an abundance of caution, Defendant Callanen denies any allegations that could pertain to her.
12. Plaintiff's allegations in Paragraph 12 are not directed toward Defendant Callanen, but in an abundance of caution, Defendant Callanen denies any allegations that could pertain to her.
13. Defendant Callanen is without sufficient knowledge or information to admit or deny the allegations in Paragraph 13.

JURISDICTION AND VENUE

14. Defendant Callanen admits that Plaintiffs bring this action under 42 U.S.C. §§ 1983 and 1988, the U.S. Constitution, and the Voting Rights Act, 52 U.S.C. § 10301 et seq.
15. The allegations in Paragraph 15 state legal conclusions to which no response is required.
16. The allegations in Paragraph 16 state legal conclusions to which no response is required.
17. The allegations in Paragraph 17 state legal conclusions to which no response is required.
18. The allegations in Paragraph 18 state legal conclusions to which no response is required.

PARTIES

19. Defendant Callanen is without sufficient knowledge or information to admit or deny the allegations in Paragraph 19.
20. Defendant Callanen is without sufficient knowledge or information to admit or deny the allegations in Paragraph 20.
21. Defendant Callanen is without sufficient knowledge or information to admit or deny the allegations in Paragraph 21.
22. Defendant Callanen is without sufficient knowledge or information to admit or deny the allegations in Paragraph 22.
23. Defendant Callanen is without sufficient knowledge or information to admit or deny the allegations in Paragraph 23.
24. Defendant Callanen is without sufficient knowledge or information to admit or deny the allegations in Paragraph 24.
25. Defendant Callanen is without sufficient knowledge or information to admit or deny the allegations in Paragraph 25.

26. Defendant Callanen admits that the Texas Secretary of State is the state's chief elections officer and has authority to prescribe voter assistance forms and to create training programs for poll watchers.

27. Defendant Callanen admits that the Texas Attorney General has some authority to prosecute criminal offenses prescribed by the election laws of Texas. Defendant Callanen lacks knowledge or information sufficient to form a belief as to whether the Attorney General's office is currently prosecuting hundreds of purported election law violations.

28. Defendant Callanen admits that she is the Bexar County Elections Administrator, but is without sufficient knowledge or information to admit or deny the remainder of the allegations in Paragraph 28.

29. Defendant Callanen admits that Joe Gonzales is the Bexar County Criminal District Attorney, but is without sufficient knowledge or information to admit or deny the remainder of the allegations in Paragraph 29.

30. Defendant Callanen admits that Dana DeBeauvoir is the Travis County Clerk, but is without sufficient knowledge or information to admit or deny the remainder of the allegations in Paragraph 30.

31. Defendant Callanen admits that José Garza is the Travis County Criminal District Attorney, but is without sufficient knowledge or information to admit or deny the remainder of the allegations in Paragraph 31.

32. Defendant Callanen admits that Isabel Longoria is the Harris County Elections Administrator, but is without sufficient knowledge or information to admit or deny the remainder of the allegations in Paragraph 32.

33. Defendant Callanen admits that Kim Ogg is the Harris County District Attorney, but is without sufficient knowledge or information to admit or deny the remainder of the allegations in Paragraph 33.

34. Defendant Callanen admits that Yvonne Ramón is the Hidalgo County Elections Administrator, but is without sufficient knowledge or information to admit or deny the remainder of the allegations in Paragraph 34.

35. Defendant Callanen admits that Ricardo Rodriguez, Jr. is the Hidalgo County Criminal District Attorney, but is without sufficient knowledge or information to admit or deny the remainder of the allegations in Paragraph 35.

36. Defendant Callanen admits that Michael Scarpello is the Dallas County Elections Administrator, but is without sufficient knowledge or information to admit or deny the remainder of the allegations in Paragraph 36.

37. Defendant Callanen admits that John Creuzot is the Dallas County District Attorney, but is without sufficient knowledge or information to admit or deny the remainder of the allegations in Paragraph 37.

38. Defendant Callanen admits that Lisa Wise is the El Paso County Elections Administrator, but is without sufficient knowledge or information to admit or deny the remainder of the allegations in Paragraph 38.

39. Defendant Callanen admits that Yvonne Rosales is the District Attorney for the 34th Judicial District, which includes El Paso, Culberson, and Hudspeth Counties, but is without sufficient knowledge or information to admit or deny the remainder of the allegations in Paragraph 39.

STATEMENT OF FACTS AND LAW

40. Plaintiff's allegations in Paragraph 40 are not directed toward Defendant Callanen, but in an abundance of caution, Defendant Callanen denies any allegations that could pertain to her.

41. Plaintiff's allegations in Paragraph 41 are not directed toward Defendant Callanen, but in an abundance of caution, Defendant Callanen denies any allegations that could pertain to her.

42. Plaintiff's allegations in Paragraph 42 are not directed toward Defendant Callanen, but in an abundance of caution, Defendant Callanen denies any allegations that could pertain to her.

43. Defendant Callanen is without sufficient knowledge or information to admit or deny the allegations in Paragraph 43.

44. Defendant Callanen is without sufficient knowledge or information to admit or deny the allegations in Paragraph 44.

45. Defendant Callanen is without sufficient knowledge or information to admit or deny the allegations in Paragraph 45.

46. Defendant Callanen is without sufficient knowledge or information to admit or deny the allegations in Paragraph 46.

47. Defendant Callanen is without sufficient knowledge or information to admit or deny the allegations in Paragraph 47.

48. Defendant Callanen is without sufficient knowledge or information to admit or deny the allegations in Paragraph 48.

49. Defendant Callanen is without sufficient knowledge or information to admit or deny the allegations in Paragraph 49.

50. Defendant Callanen is without sufficient knowledge or information to admit or deny the allegations in Paragraph 50.

51. Defendant Callanen is without sufficient knowledge or information to admit or deny the allegations in Paragraph 51.

52. Defendant Callanen is without sufficient knowledge or information to admit or deny the allegations in Paragraph 52.

53. Defendant Callanen is without sufficient knowledge or information to admit or deny the allegations in Paragraph 53.

54. Defendant Callanen is without sufficient knowledge or information to admit or deny the allegations in Paragraph 54.

55. Defendant Callanen is without sufficient knowledge or information to admit or deny the allegations in Paragraph 55.

56. Defendant Callanen is without sufficient knowledge or information to admit or deny the allegations in Paragraph 56.

57. Defendant Callanen is without sufficient knowledge or information to admit or deny the allegations in Paragraph 57.

58. Defendant Callanen is without sufficient knowledge or information to admit or deny the allegations in Paragraph 58.

59. Defendant Callanen is without sufficient knowledge or information to admit or deny the allegations in Paragraph 59.

60. Defendant Callanen is without sufficient knowledge or information to admit or deny the allegations in Paragraph 60.

61. Defendant Callanen is without sufficient knowledge or information to admit or deny the allegations in Paragraph 61.

62. Defendant Callanen is without sufficient knowledge or information to admit or deny the allegations in Paragraph 62.

63. Defendant Callanen is without sufficient knowledge or information to admit or deny the allegations in Paragraph 63.

64. Defendant Callanen is without sufficient knowledge or information to admit or deny the allegations in Paragraph 64.

65. Defendant Callanen is without sufficient knowledge or information to admit or deny the allegations in Paragraph 65.

66. Defendant Callanen is without sufficient knowledge or information to admit or deny the allegations in Paragraph 66.

67. Defendant Callanen is without sufficient knowledge or information to admit or deny the allegations in Paragraph 67.

68. Defendant Callanen is without sufficient knowledge or information to admit or deny the allegations in Paragraph 68.

69. Defendant Callanen is without sufficient knowledge or information to admit or deny the allegations in Paragraph 69.

70. Defendant Callanen is without sufficient knowledge or information to admit or deny the allegations in Paragraph 70.

71. Defendant Callanen is without sufficient knowledge or information to admit or deny the allegations in Paragraph 71.

72. Defendant Callanen is without sufficient knowledge or information to admit or deny the allegations in Paragraph 72.

73. Defendant Callanen is without sufficient knowledge or information to admit or deny the allegations in Paragraph 73.

74. Defendant Callanen is without sufficient knowledge or information to admit or deny the allegations in Paragraph 74.

75. Defendant Callanen is without sufficient knowledge or information to admit or deny the allegations in Paragraph 75.

76. Defendant Callanen is without sufficient knowledge or information to admit or deny the allegations in Paragraph 76.

77. Defendant Callanen is without sufficient knowledge or information to admit or deny the allegations in Paragraph 77.

78. Defendant Callanen is without sufficient knowledge or information to admit or deny the allegations in Paragraph 78.

79. Defendant Callanen is without sufficient knowledge or information to admit or deny the allegations in Paragraph 79.

80. Defendant Callanen is without sufficient knowledge or information to admit or deny the allegations in Paragraph 80.

81. Defendant Callanen is without sufficient knowledge or information to admit or deny the allegations in Paragraph 81.

82. Defendant Callanen is without sufficient knowledge or information to admit or deny the allegations in Paragraph 82.

83. Defendant Callanen is without sufficient knowledge or information to admit or deny the allegations in Paragraph 83.

84. Defendant Callanen is without sufficient knowledge or information to admit or deny the allegations in Paragraph 84.

85. Defendant Callanen is without sufficient knowledge or information to admit or deny the allegations in Paragraph 85.

86. Defendant Callanen is without sufficient knowledge or information to admit or deny the allegations in Paragraph 86.

87. Defendant Callanen is without sufficient knowledge or information to admit or deny the allegations in Paragraph 87.

88. Defendant Callanen is without sufficient knowledge or information to admit or deny the allegations in Paragraph 88.

89. Defendant Callanen is without sufficient knowledge or information to admit or deny the allegations in Paragraph 89.

90. Defendant Callanen is without sufficient knowledge or information to admit or deny the allegations in Paragraph 90.

91. Defendant Callanen is without sufficient knowledge or information to admit or deny the allegations in Paragraph 91.

92. Defendant Callanen is without sufficient knowledge or information to admit or deny the allegations in Paragraph 92.

93. Defendant Callanen is without sufficient knowledge or information to admit or deny the allegations in Paragraph 93.

94. Defendant Callanen is without sufficient knowledge or information to admit or deny the allegations in Paragraph 94.

95. Defendant Callanen is without sufficient knowledge or information to admit or deny the allegations in Paragraph 95.

96. Defendant Callanen is without sufficient knowledge or information to admit or deny the allegations in Paragraph 96.

97. Defendant Callanen is without sufficient knowledge or information to admit or deny the allegations in Paragraph 97.

98. Defendant Callanen is without sufficient knowledge or information to admit or deny the allegations in Paragraph 98.

99. Defendant Callanen is without sufficient knowledge or information to admit or deny the allegations in Paragraph 99.

100. Defendant Callanen is without sufficient knowledge or information to admit or deny the allegations in Paragraph 100.

101. Defendant Callanen is without sufficient knowledge or information to admit or deny the allegations in Paragraph 101.

102. Defendant Callanen is without sufficient knowledge or information to admit or deny the allegations in Paragraph 102.

103. Defendant Callanen is without sufficient knowledge or information to admit or deny the allegations in Paragraph 103.

104. Defendant Callanen is without sufficient knowledge or information to admit or deny the allegations in Paragraph 104.

105. Defendant Callanen is without sufficient knowledge or information to admit or deny the allegations in Paragraph 105.

106. Defendant Callanen is without sufficient knowledge or information to admit or deny the allegations in Paragraph 106.

107. Defendant Callanen is without sufficient knowledge or information to admit or deny the allegations in Paragraph 107.

108. Defendant Callanen is without sufficient knowledge or information to admit or deny the allegations in Paragraph 108.

109. Defendant Callanen is without sufficient knowledge or information to admit or deny the allegations in Paragraph 109.

110. Defendant Callanen is without sufficient knowledge or information to admit or deny the allegations in Paragraph 110.

111. Defendant Callanen is without sufficient knowledge or information to admit or deny the allegations in Paragraph 111.

112. Defendant Callanen is without sufficient knowledge or information to admit or deny the allegations in Paragraph 112.

113. Defendant Callanen is without sufficient knowledge or information to admit or deny the allegations in Paragraph 113.

114. Defendant Callanen is without sufficient knowledge or information to admit or deny the allegations in Paragraph 114.

115. Defendant Callanen is without sufficient knowledge or information to admit or deny the allegations in Paragraph 115.

116. Defendant Callanen is without sufficient knowledge or information to admit or deny the allegations in Paragraph 116.

117. Defendant Callanen is without sufficient knowledge or information to admit or deny the allegations in Paragraph 117.

118. Defendant Callanen is without sufficient knowledge or information to admit or deny the allegations in Paragraph 118.

119. Defendant Callanen is without sufficient knowledge or information to admit or deny the allegations in Paragraph 119.

120. Defendant Callanen is without sufficient knowledge or information to admit or deny the allegations in Paragraph 120.

121. Defendant Callanen is without sufficient knowledge or information to admit or deny the allegations in Paragraph 121.

122. Defendant Callanen is without sufficient knowledge or information to admit or deny the allegations in Paragraph 122.

123. Defendant Callanen is without sufficient knowledge or information to admit or deny the allegations in Paragraph 123.

124. Defendant Callanen is without sufficient knowledge or information to admit or deny the allegations in Paragraph 124.

125. Defendant Callanen is without sufficient knowledge or information to admit or deny the allegations in Paragraph 125.

126. Defendant Callanen is without sufficient knowledge or information to admit or deny the allegations in Paragraph 126.

127. Defendant Callanen is without sufficient knowledge or information to admit or deny the allegations in Paragraph 127.

128. Defendant Callanen is without sufficient knowledge or information to admit or deny the allegations in Paragraph 128.

129. Defendant Callanen is without sufficient knowledge or information to admit or deny the allegations in Paragraph 129.

130. Defendant Callanen is without sufficient knowledge or information to admit or deny the allegations in Paragraph 130.

131. Defendant Callanen is without sufficient knowledge or information to admit or deny the allegations in Paragraph 131.

132. Defendant Callanen is without sufficient knowledge or information to admit or deny the allegations in Paragraph 132.

133. Defendant Callanen is without sufficient knowledge or information to admit or deny the allegations in Paragraph 133.

134. Defendant Callanen is without sufficient knowledge or information to admit or deny the allegations in Paragraph 134.

135. Defendant Callanen is without sufficient knowledge or information to admit or deny the allegations in Paragraph 135.

136. Defendant Callanen is without sufficient knowledge or information to admit or deny the allegations in Paragraph 136.

137. Defendant Callanen is without sufficient knowledge or information to admit or deny the allegations in Paragraph 137.

138. Defendant Callanen is without sufficient knowledge or information to admit or deny the allegations in Paragraph 138.

139. Defendant Callanen is without sufficient knowledge or information to admit or deny the allegations in Paragraph 139.

140. Defendant Callanen is without sufficient knowledge or information to admit or deny the allegations in Paragraph 140.

141. Defendant Callanen is without sufficient knowledge or information to admit or deny the allegations in Paragraph 141.

142. Defendant Callanen is without sufficient knowledge or information to admit or deny the allegations in Paragraph 142.

143. Defendant Callanen is without sufficient knowledge or information to admit or deny the allegations in Paragraph 143.

144. Defendant Callanen is without sufficient knowledge or information to admit or deny the allegations in Paragraph 144.

145. Defendant Callanen is without sufficient knowledge or information to admit or deny the allegations in Paragraph 145.

146. Defendant Callanen is without sufficient knowledge or information to admit or deny the allegations in Paragraph 146.

147. Defendant Callanen is without sufficient knowledge or information to admit or deny the allegations in Paragraph 147.

148. Defendant Callanen is without sufficient knowledge or information to admit or deny the allegations in Paragraph 148.

149. Defendant Callanen is without sufficient knowledge or information to admit or deny the allegations in Paragraph 149.

150. Defendant Callanen is without sufficient knowledge or information to admit or deny the allegations in Paragraph 150.

151. Defendant Callanen is without sufficient knowledge or information to admit or deny the allegations in Paragraph 151.

152. Defendant Callanen is without sufficient knowledge or information to admit or deny the allegations in Paragraph 152.

153. Defendant Callanen is without sufficient knowledge or information to admit or deny the allegations in Paragraph 153.

154. Defendant Callanen is without sufficient knowledge or information to admit or deny the allegations in Paragraph 154.

155. Defendant Callanen is without sufficient knowledge or information to admit or deny the allegations in Paragraph 155.

156. Defendant Callanen is without sufficient knowledge or information to admit or deny the allegations in Paragraph 156.

157. Defendant Callanen is without sufficient knowledge or information to admit or deny the allegations in Paragraph 157.

158. Defendant Callanen is without sufficient knowledge or information to admit or deny the allegations in Paragraph 158.

159. Defendant Callanen is without sufficient knowledge or information to admit or deny the allegations in Paragraph 159.

160. The allegations in Paragraph 160 state legal conclusions to which no response is required.

161. The allegations in Paragraph 161 state legal conclusions to which no response is required.

162. The allegations in Paragraph 162 state legal conclusions to which no response is required.

163. The allegations in Paragraph 163 state legal conclusions to which no response is required.
164. The allegations in Paragraph 164 state legal conclusions to which no response is required.
165. The allegations in Paragraph 165 state legal conclusions to which no response is required.
166. The allegations in Paragraph 166 state legal conclusions to which no response is required.
167. The allegations in Paragraph 167 state legal conclusions to which no response is required.
168. The allegations in Paragraph 168 state legal conclusions to which no response is required.
169. The allegations in Paragraph 169 state legal conclusions to which no response is required.
170. The allegations in Paragraph 170 state legal conclusions to which no response is required.
171. The allegations in Paragraph 171 state legal conclusions to which no response is required.
172. The allegations in Paragraph 172 state legal conclusions to which no response is required.
173. The allegations in Paragraph 173 state legal conclusions to which no response is required.
174. The allegations in Paragraph 174 state legal conclusions to which no response is required.
175. The allegations in Paragraph 175 state legal conclusions to which no response is required.
176. The allegations in Paragraph 176 state legal conclusions to which no response is required.
177. The allegations in Paragraph 177 state legal conclusions to which no response is required.
178. The allegations in Paragraph 178 state legal conclusions to which no response is required.
179. The allegations in Paragraph 179 state legal conclusions to which no response is required.
180. The allegations in Paragraph 180 state legal conclusions to which no response is required.
181. The allegations in Paragraph 181 state legal conclusions to which no response is required.
182. The allegations in Paragraph 182 state legal conclusions to which no response is required.
183. The allegations in Paragraph 183 state legal conclusions to which no response is required.
184. The allegations in Paragraph 184 state legal conclusions to which no response is required.
185. The allegations in Paragraph 185 state legal conclusions to which no response is required.

186. The allegations in Paragraph 186 state legal conclusions to which no response is required.
187. The allegations in Paragraph 187 state legal conclusions to which no response is required.
188. The allegations in Paragraph 188 state legal conclusions to which no response is required.
189. The allegations in Paragraph 189 state legal conclusions to which no response is required.
190. The allegations in Paragraph 190 state legal conclusions to which no response is required.
191. Plaintiff's allegations in Paragraph 191 are not directed toward Defendant Callanen, but in an abundance of caution, Defendant Callanen denies any allegations that could pertain to her.
192. Defendant Callanen is without sufficient knowledge or information to admit or deny the allegations in Paragraph 192.
193. Defendant Callanen is without sufficient knowledge or information to admit or deny the allegations in Paragraph 193.
194. Defendant Callanen is without sufficient knowledge or information to admit or deny the allegations in Paragraph 194.
195. Defendant Callanen is without sufficient knowledge or information to admit or deny the allegations in Paragraph 195.
196. Defendant Callanen is without sufficient knowledge or information to admit or deny the allegations in Paragraph 196.
197. Defendant Callanen is without sufficient knowledge or information to admit or deny the allegations in Paragraph 197.
198. Defendant Callanen is without sufficient knowledge or information to admit or deny the allegations in Paragraph 198.
199. Defendant Callanen is without sufficient knowledge or information to admit or deny the allegations in Paragraph 199.

200. Plaintiff's allegations in Paragraph 200 are not directed toward Defendant Callanen, but in an abundance of caution, Defendant Callanen denies any allegations that could pertain to her.

201. Plaintiff's allegations in Paragraph 201 are not directed toward Defendant Callanen, but in an abundance of caution, Defendant Callanen denies any allegations that could pertain to her.

202. Plaintiff's allegations in Paragraph 202 are not directed toward Defendant Callanen, but in an abundance of caution, Defendant Callanen denies any allegations that could pertain to her.

203. Plaintiff's allegations in Paragraph 203 are not directed toward Defendant Callanen, but in an abundance of caution, Defendant Callanen denies any allegations that could pertain to her.

204. Plaintiff's allegations in Paragraph 204 are not directed toward Defendant Callanen, but in an abundance of caution, Defendant Callanen denies any allegations that could pertain to her.

205. Plaintiff's allegations in Paragraph 205 are not directed toward Defendant Callanen, but in an abundance of caution, Defendant Callanen denies any allegations that could pertain to her.

206. Plaintiff's allegations in Paragraph 206 are not directed toward Defendant Callanen, but in an abundance of caution, Defendant Callanen denies any allegations that could pertain to her.

207. Plaintiff's allegations in Paragraph 207 are not directed toward Defendant Callanen, but in an abundance of caution, Defendant Callanen denies any allegations that could pertain to her.

208. Plaintiff's allegations in Paragraph 208 are not directed toward Defendant Callanen, but in an abundance of caution, Defendant Callanen denies any allegations that could pertain to her.

209. Plaintiff's allegations in Paragraph 209 are not directed toward Defendant Callanen, but in an abundance of caution, Defendant Callanen denies any allegations that could pertain to her.

210. Plaintiff's allegations in Paragraph 210 are not directed toward Defendant Callanen, but in an abundance of caution, Defendant Callanen denies any allegations that could pertain to her.

211. Plaintiff's allegations in Paragraph 211 are not directed toward Defendant Callanen, but in an abundance of caution, Defendant Callanen denies any allegations that could pertain to her.

212. Plaintiff's allegations in Paragraph 212 are not directed toward Defendant Callanen, but in an abundance of caution, Defendant Callanen denies any allegations that could pertain to her.

213. Plaintiff's allegations in Paragraph 213 are not directed toward Defendant Callanen, but in an abundance of caution, Defendant Callanen denies any allegations that could pertain to her.

214. Plaintiff's allegations in Paragraph 214 are not directed toward Defendant Callanen, but in an abundance of caution, Defendant Callanen denies any allegations that could pertain to her.

215. Plaintiff's allegations in Paragraph 215 are not directed toward Defendant Callanen, but in an abundance of caution, Defendant Callanen denies any allegations that could pertain to her.

216. Plaintiff's allegations in Paragraph 216 are not directed toward Defendant Callanen, but in an abundance of caution, Defendant Callanen denies any allegations that could pertain to her.

217. Plaintiff's allegations in Paragraph 217 are not directed toward Defendant Callanen, but in an abundance of caution, Defendant Callanen denies any allegations that could pertain to her.

218. Plaintiff's allegations in Paragraph 218 are not directed toward Defendant Callanen, but in an abundance of caution, Defendant Callanen denies any allegations that could pertain to her.

219. Plaintiff's allegations in Paragraph 219 are not directed toward Defendant Callanen, but in an abundance of caution, Defendant Callanen denies any allegations that could pertain to her.

220. Plaintiff's allegations in Paragraph 220 are not directed toward Defendant Callanen, but in an abundance of caution, Defendant Callanen denies any allegations that could pertain to her.

221. Plaintiff's allegations in Paragraph 221 are not directed toward Defendant Callanen, but in an abundance of caution, Defendant Callanen denies any allegations that could pertain to her.

222. Plaintiff's allegations in Paragraph 222 are not directed toward Defendant Callanen, but in an abundance of caution, Defendant Callanen denies any allegations that could pertain to her.

223. Plaintiff's allegations in Paragraph 223 are not directed toward Defendant Callanen, but in an abundance of caution, Defendant Callanen denies any allegations that could pertain to her.

224. Plaintiff's allegations in Paragraph 224 are not directed toward Defendant Callanen, but in an abundance of caution, Defendant Callanen denies any allegations that could pertain to her.

225. Plaintiff's allegations in Paragraph 225 are not directed toward Defendant Callanen, but in an abundance of caution, Defendant Callanen denies any allegations that could pertain to her.

226. Plaintiff's allegations in Paragraph 226 are not directed toward Defendant Callanen, but in an abundance of caution, Defendant Callanen denies any allegations that could pertain to her.

227. Plaintiff's allegations in Paragraph 227 are not directed toward Defendant Callanen, but in an abundance of caution, Defendant Callanen denies any allegations that could pertain to her.

228. Plaintiff's allegations in Paragraph 228 are not directed toward Defendant Callanen, but in an abundance of caution, Defendant Callanen denies any allegations that could pertain to her.

229. Plaintiff's allegations in Paragraph 229 are not directed toward Defendant Callanen, but in an abundance of caution, Defendant Callanen denies any allegations that could pertain to her.

230. Plaintiff's allegations in Paragraph 230 are not directed toward Defendant Callanen, but in an abundance of caution, Defendant Callanen denies any allegations that could pertain to her.

231. Plaintiff's allegations in Paragraph 231 are not directed toward Defendant Callanen, but in an abundance of caution, Defendant Callanen denies any allegations that could pertain to her.

232. Plaintiff's allegations in Paragraph 232 are not directed toward Defendant Callanen, but in an abundance of caution, Defendant Callanen denies any allegations that could pertain to her.

233. Plaintiff's allegations in Paragraph 233 are not directed toward Defendant Callanen, but in an abundance of caution, Defendant Callanen denies any allegations that could pertain to her.

234. Plaintiff's allegations in Paragraph 234 are not directed toward Defendant Callanen, but in an abundance of caution, Defendant Callanen denies any allegations that could pertain to her.

235. Plaintiff's allegations in Paragraph 235 are not directed toward Defendant Callanen, but in an abundance of caution, Defendant Callanen denies any allegations that could pertain to her.

236. Plaintiff's allegations in Paragraph 236 are not directed toward Defendant Callanen, but in an abundance of caution, Defendant Callanen denies any allegations that could pertain to her.

237. Plaintiff's allegations in Paragraph 237 are not directed toward Defendant Callanen, but in an abundance of caution, Defendant Callanen denies any allegations that could pertain to her.

238. Plaintiff's allegations in Paragraph 238 are not directed toward Defendant Callanen, but in an abundance of caution, Defendant Callanen denies any allegations that could pertain to her.

239. Plaintiff's allegations in Paragraph 239 are not directed toward Defendant Callanen, but in an abundance of caution, Defendant Callanen denies any allegations that could pertain to her.

240. Plaintiff's allegations in Paragraph 240 are not directed toward Defendant Callanen, but in an abundance of caution, Defendant Callanen denies any allegations that could pertain to her.

241. Plaintiff's allegations in Paragraph 241 are not directed toward Defendant Callanen, but in an abundance of caution, Defendant Callanen denies any allegations that could pertain to her.

242. Plaintiff's allegations in Paragraph 242 are not directed toward Defendant Callanen, but in an abundance of caution, Defendant Callanen denies any allegations that could pertain to her.

243. Plaintiff's allegations in Paragraph 243 are not directed toward Defendant Callanen, but in an abundance of caution, Defendant Callanen denies any allegations that could pertain to her.

244. Plaintiff's allegations in Paragraph 244 are not directed toward Defendant Callanen, but in an abundance of caution, Defendant Callanen denies any allegations that could pertain to her.

245. Plaintiff's allegations in Paragraph 245 are not directed toward Defendant Callanen, but in an abundance of caution, Defendant Callanen denies any allegations that could pertain to her.

246. Plaintiff's allegations in Paragraph 246 are not directed toward Defendant Callanen, but in an abundance of caution, Defendant Callanen denies any allegations that could pertain to her.

247. Plaintiff's allegations in Paragraph 247 are not directed toward Defendant Callanen, but in an abundance of caution, Defendant Callanen denies any allegations that could pertain to her.

248. Plaintiff's allegations in Paragraph 248 are not directed toward Defendant Callanen, but in an abundance of caution, Defendant Callanen denies any allegations that could pertain to her.

CLAIMS FOR RELIEF

COUNT I

52 U.S.C. § 10301(a)

Violation of Section 2 of the Voting Rights Act

Against Defendants Gonzales, Garza, Ogg, Rodriguez, Creuzot, Rosales, Callanen, DeBeauvoir, Longoria, Ramón, Scarpello, and Wise

249. In response to Paragraph 249, Defendant Callanen incorporates by reference all of her former responses.

250. The allegations in Paragraph 250 state legal conclusions to which no response is required.

251. The allegations in Paragraph 251 state legal conclusions to which no response is required.

252. The allegations in Paragraph 252 state legal conclusions to which no response is required.

253. The allegations in Paragraph 253 state legal conclusions to which no response is required.

254. The allegations in Paragraph 254 state legal conclusions to which no response is required.

255. Defendant Callanen is without sufficient knowledge or information to admit or deny the allegations in Paragraph 255.

256. The allegations in Paragraph 256 state legal conclusions to which no response is required.

COUNT II

U.S. Const. Amends. I, XIV; 42 U.S.C. § 1983

Undue Burden on the Right to Vote

Against Defendants Callanen, DeBeavoir, Longoria, Ramón, Scarpello, and Wise

257. In response to Paragraph 257, Defendant Callanen incorporates by reference all of her former responses.

258. The allegations in Paragraph 258 state legal conclusions to which no response is required.

259. The allegations in Paragraph 259 state legal conclusions to which no response is required.

260. The allegations in Paragraph 260 state legal conclusions to which no response is required.

261. The allegations in Paragraph 261 state legal conclusions to which no response is required.

262. The allegations in Paragraph 262 state legal conclusions to which no response is required.

263. The allegations in Paragraph 263 state legal conclusions to which no response is required.

264. The allegations in Paragraph 264 state legal conclusions to which no response is required.

265. The allegations in Paragraph 265 state legal conclusions to which no response is required.

266. The allegations in Paragraph 266 state legal conclusions to which no response is required.

267. The allegations in Paragraph 267 state legal conclusions to which no response is required.

268. The allegations in Paragraph 268 state legal conclusions to which no response is required.

269. The allegations in Paragraph 269 state legal conclusions to which no response is required.

270. The allegations in Paragraph 270 state legal conclusions to which no response is required.

271. Defendant Callanen is without sufficient knowledge or information to admit or deny the allegations in Paragraph 271.

272. The allegations in Paragraph 272 state legal conclusions to which no response is required.

COUNT III

**U.S. Const. Amends. I, XIV; 42 U.S.C. § 1983
Restriction on Free Speech and Expression
Against Defendants Gonzales, Garza, Ogg, Rodriguez, Creuzot, Rosales, Callanen,
DeBeauvoir, Longoria, Ramón, Scapello, and Wise**

273. In response to Paragraph 273, Defendant Callanen incorporates by reference all of her former responses.

274. The allegations in Paragraph 274 state legal conclusions to which no response is required.

275. The allegations in Paragraph 275 state legal conclusions to which no response is required.

276. The allegations in Paragraph 276 state legal conclusions to which no response is required.

277. The allegations in Paragraph 277 state legal conclusions to which no response is required.

278. The allegations in Paragraph 278 state legal conclusions to which no response is required.

279. The allegations in Paragraph 279 state legal conclusions to which no response is required.

280. The allegations in Paragraph 280 state legal conclusions to which no response is required.

281. The allegations in Paragraph 281 state legal conclusions to which no response is required.

282. The allegations in Paragraph 282 state legal conclusions to which no response is required.

283. The allegations in Paragraph 283 state legal conclusions to which no response is required.

284. The allegations in Paragraph 284 state legal conclusions to which no response is required.

285. Defendant Callanen is without sufficient knowledge or information to admit or deny the allegations in Paragraph 285.

286. The allegations in Paragraph 286 state legal conclusions to which no response is required.

COUNT IV

**52 U.S.C. § 10508
Violation of Section 208 of the Voting Rights Act
Against All Defendants**

287. In response to Paragraph 287, Defendant Callanen incorporates by reference all of her former responses.

288. The allegations in Paragraph 288 state legal conclusions to which no response is required.

289. The allegations in Paragraph 289 state legal conclusions to which no response is required.

290. The allegations in Paragraph 290 state legal conclusions to which no response is required.

291. The allegations in Paragraph 291 state legal conclusions to which no response is required.

292. The allegations in Paragraph 292 state legal conclusions to which no response is required.

293. The allegations in Paragraph 293 state legal conclusions to which no response is required.

294. The allegations in Paragraph 294 state legal conclusions to which no response is required.

PRAYER FOR RELIEF

Defendant Callanen denies that she has taken any action that violated Plaintiffs' rights or that Plaintiffs are entitled to relief against her.

AFFIRMATIVE DEFENSES

Defendant Callanen asserts that sovereign immunity, qualified immunity, and principles of equity and justice bar Plaintiff's recovery of attorneys' fees from Defendant Callanen, who did not enact S.B. 1.

RIGHT TO RAISE ADDITIONAL DEFENSES

Defendant Callanen reserves the right to raise affirmative and other defenses that may become apparent throughout the factual development of this case.

JURY DEMAND

Defendant Callanen demands a trial by jury as to all issues so triable.

PRAYER

WHEREFORE, PREMISES CONSIDERED, Defendant Callanen prays that Plaintiffs take nothing from Bexar County or Defendant Callanen by way of their suit.

Dated: February 1, 2022.

Respectfully Submitted,
JOE GONZALES
Bexar County Criminal District Attorney

By: /s/ Robert Green
ROBERT GREEN
Bar No. 24087626
Assistant District Attorney, Civil Division
101 W. Nueva, 7th Floor
San Antonio, Texas 78205
Telephone: (210) 335-2146
robert.green@bexar.org
Attorney for Defendant Bexar County
Elections Administrator Jacquelyn Callanen

CERTIFICATE OF SERVICE

I do hereby certify that, on the 1st day of February, 2022, I electronically filed the foregoing document with the Clerk of Court using the CM/ECF system, which provided electronic service upon all parties.

/s/ Robert Green

ROBERT GREEN